## - REMARKS -

Claims 1 to 33 remain pending in the present application.

Claims 1 and 22 are presently amended to clarify the claimed subject matter.

The subject matter of the present amendment is fully supported by the overall original description, and specifically by at least paragraphs [0048], [0050] and [0055].

The present amendment therefore does not introduce new subject matter to the application.

Rejection of claims 1-8, 9-13, 18-31 and 33 under 35 USC 102(e) as being anticipated by Schulz (U.S. 6,185,538)

In response to the rejection of claim 1, the Applicant submits that Schulz does not disclose the subject matter of amended claim 1.

More particularly, Schulz does not teach (1) "each of the basic units corresponding to a sound in a word" and (2) the basic units "each being related to at least one of the related time codes" as claimed in amended claim 1.

Concerning (1), Schulz teaches in col. 4, lines 26-49 that "the speech recognition module 21 defines <u>words</u> in the audio source signals and writes the defined words as <u>a digital character sequence</u>", and that "a given time code value can be assigned to <u>each word</u> of the text" (emphasis added). Schulz therefore discloses a <u>word level</u> recognition and time code association.

Since Schulz teaches a word level recognition, Schulz cannot not teach "basic units corresponding to a sound in a word" as claimed.

Now concerning (2), the basic units "each being related to at least one of the time codes", the Applicant submits that the "start time" and the "end time" in Schulz refer to "an edit start and/or edit end on the basis of the text" (col. 5, lines 34-35 and Fig. 2) once translated from the audio source, for post-editing purposes. This "start time" and "end time" in Schulz has no relation with the speech recognition of each word.

In light of the above, Schulz therefore does not teach (1) "each of the basic units corresponding to a sound in a word" and (2) the basic units "each being related to at least one of the related time codes" as claimed in amended claim 1.

In view of the above remarks and amendments, the Applicant submits that the rejection of claim 1 is overcome.

Arguments similar to those stated hereinabove concerning claim 1 also apply with respect to independent method claim 22 since amended claim 22 recites the same limitation as amended claim 1. Amended claim 22 therefore overcomes the rejection.

In view of the above arguments and claim dependencies over either one of claims 1 and 22, the rejections directed to dependent claims 2-8, 9-13, 18-21, 23-31 and 33 are also overcome. The Applicant kindly requests reconsideration of the claimed subject matter.

## Rejection of claim 9 under 35 USC 103(a) over Schulz in view of one of Casey (2001/0044719)

In view of the above arguments provided in response to anticipation rejections over Schulz, reconsideration of the above rejection of claim 9 is respectfully requested.

## Rejections of claims 14-18 under 35 USC 103(a) over Schulz in view of one of Lande et al. (U.S. 6.665.643)

In view of the above arguments provided in response to anticipation rejections over Schulz, reconsideration of the above rejections of claims 14-18 is respectfully requested.

Further in response to the above rejections, the Applicant submits that Lande et al. also do not teach the claimed subject matter since there is disclosed that "the synthesis module SY does not 25 generate phonemes in a continuous way, but it supplies groups of phonemes corresponding to the sentence or the part of the sentence which is read from the input text. As a consequence, facial animation module AF must keep track of which phoneme is being used at a given time. This is achieved through appropriate time information provided by synthesis module SY." (emphasis added) (col.5, lines 10-16). Lande et al. teach generating groups of phonemes for supply to the synthesis module, which in turn provides time information (accordingly for a group of phoneme).

In view of the above arguments, reconsideration of the rejections to claims 14-18 is respectfully requested.

Rejection of claim 32 under 35 USC 103(a) over Schulz in view of one of Olmedo (U.S. 6.174,170)

In view of the above arguments provided in response to anticipation rejections over Schulz, reconsideration of the above rejection of claim 32 is respectfully requested.

In view of the foregoing amendments and remarks, this application is now believed to be in condition for allowance and early notice to that effect is earnestly solicited.

Respectfully submitted, Ryshco Media Inc.

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